

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re

Alexander E. Jones,
Debtor.

Bankruptcy

Case No. 22-33553 (CML)

Chapter 11

Neil Heslin, Scarlett Lewis, Leonard Pozner,
Veronique De La Rosa, and Estate Of Marcel
Fontaine,

Plaintiffs

v.

Alexander E. Jones,
Defendant.

Adv. Pro. No. 23-03035 (CML)

David Wheeler, Francine Wheeler, Jacqueline
Barden, Mark Barden, Nicole Hockley, Ian
Hockley, Jennifer Hensel, Donna Soto, Carlee
Soto-Parisi, Carlos M. Soto, Jillian Soto Marino,
William Aldenberg, William Sherlach, Robert
Parker, and Richard M. Coan, as chapter 7 trustee
for the estate of Erica Lafferty,

Plaintiffs,

v.

Alexander E. Jones,
Defendant.

Adv. Pro. No. 23-03037 (CML)

**DEFENDANT ALEXANDER E. JONES'S UNOPPOSED MOTION TO EXTEND
DEADLINE TO FILE ANSWER**

Defendant Alexander E. Jones ("Jones" and "Defendant") respectfully requests that the Court, for good cause shown, extend Jones's deadline to file his answer to the adversary complaints filed by Plaintiffs Neil Heslin, Scarlett Lewis, Leonard Pozner, Veronique De La Rosa, the Estate

of Marcel Fontaine David Wheeler, Francine Wheeler, Jacqueline Barden, Mark Barden, Nicole Hockley, Ian Hockley, Jennifer Hensel, Donna Soto, Carlee Soto-Parisi, Carlos M. Soto, Jillian Soto Marino, William Aldenberg, William Sherlach, Robert Parker, and Richard M. Coan, as chapter 7 trustee for the estate of Erica Lafferty (“Plaintiffs”).

On April 13, 2023, this Court entered the *Parties’ Stipulation and Agreed Order Regarding the Dismissal of FSS from the Jones Adversary Proceedings and Schedule for the Answer and Summary Judgment Briefing Plaintiffs’ Complaint* (the “Scheduling Order”) (Doc. No. 13). The Scheduling Order set April 28, 2023 as the date that “Jones shall answer the adversary complaints in the Jones Adversary Proceedings¹.” The Court, for good cause shown, may extend the time for Jones’s answer deadline. Fed. R. Civ. P. 16(b)(1)(A). Plaintiffs rely on citations to transcripts from the underlying state court trials, but did not attach copies of the trial transcripts to the adversary complaints. Thus, drafting an answer to the adversary complaints requires full review of the trial testimony from the underlying state court trials. Counsel for Jones encountered initial delays in obtaining the transcripts, which has in turn delayed drafting Jones’s answers.

All counsel have conferred and Plaintiffs do not oppose the relief requested in this Motion.

WHEREFORE, Defendant respectfully requests the Court to enter an Order that modifies Defendant’s deadline to answer the adversary complaints from April 28, 2023 to May 5, 2023, and for such other and further relief as it deems just and proper.

Dated: April 26th, 2023

¹ All capitalized terms not herein defined refer to the definitions given in the Scheduling Order.

Respectfully submitted,

CROWE & DUNLEVY, P.C.

/s/ Christina W. Stephenson

Christina W. Stephenson
State Bar No. 24049535
2525 McKinnon Avenue, Suite 425
Dallas, TX 75201
Telephone: 737- 218-6187
dallaseservice@crowedunlevy.com

-AND-

J. Christopher Davis
Oklahoma Bar #16629 (pro hac vice pending)
Deric J. McClellan
Oklahoma Bar # 32827 (pro hac vice pending)
222 N. Detroit Ave., Suite 600
Tulsa, Oklahoma 74120
Telephone: 737- 218-6187
dallaseservice@crowedunlevy.com

COUNSEL FOR THE DEFENDANTS

CERTIFICATE OF CONFERENCE

The undersigned certifies that prior to filing this motion a conference was held with Plaintiffs' Counsel via email on April 25, 2023, at which time Plaintiffs' confirmed that they are unopposed to the relief sought in this Motion.

/s/ Christina W. Stephenson

Christina W. Stephenson

CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of April 2023, a true and correct copy of the foregoing was served via the Court's ECF system to the parties registered to receive electronic service.

/s/ Christina W. Stephenson
Christina W. Stephenson